



March 29, 2022

By ECF

Hon. Philip M. Halpern  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *Bierce v. Schepperly, et al.*  
Docket No.: 20 Civ. 320 (PMH) (AEK)  
File No.: 200021

Your Honor:

We represent Defendant James Schepperly. We write for all Defendants to ask for a brief extension of time for the parties to submit the Proposed Joint Pretrial Order—from Thursday, March 31, 2022 to Monday, April 4, 2022. This request is necessary to give us sufficient time to confer among ourselves and with Plaintiff's counsel and to complete the joint submission.

This is our **first request** for an extension of this deadline, made necessary by an unusually high volume of depositions (including one tomorrow) and submissions due as we work our way out of the pandemic backlog.

Plaintiff's counsel has not indicated whether Plaintiff consents to the request but stated he (counsel) would prefer to "timely file this." We share this sentiment, of course, but we believe it is not feasible to cooperatively complete the JPTO in the time remaining. The brief extension we request will not prejudice any party and will not delay the adjudication of this matter.

Thank you for your consideration.

Respectfully submitted,  
SOKOLOFF STERN LLP

A handwritten signature in black ink, appearing to read "Leo Dorfman", is written over the printed name.  
Leo Dorfman

cc: All counsel of record (by ECF)

Application granted. The time for the parties to file the Proposed JPTO is extended to and including April 4, 2022. The deadline for filing those items required under Rule 6(B) of this Court's Individual Practices remains unchanged.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 52.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Philip M. Halpern", is written over the printed name.

Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
March 30, 2022